

# **EXHIBIT 10**

## **Redacted Excerpts from Deposition of Denitza Batchvarova**

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON )  
FITCH, on behalf of )  
themselves and all others )  
similarly situated, )  
 )  
Plaintiffs, )  
 )  
vs. ) Case No.  
 ) 2:15-cv-01045-RFB-(PAL)  
 )  
ZUFFA, LLC, d/b/a Ultimate )  
Fighting Championship and )  
UFC, )  
 )  
Defendant. )  
 )

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VIDEOTAPED DEPOSITION OF DENITZA BATCHVAROVA

Las Vegas, Nevada

January 25, 2017

9:11 A.M.

Reported by:  
Sarah Padilla, CCR NO. 929  
Job No. 48403



9 (Pages 30 to 33)

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**Q** You have been handed what has been marked Exhibit 96, which is Bates stamped ZFL-0895313 and attachment ZFL-0895314.

(Exhibit 96 was marked.)

BY MR. SILVERMAN:

**Q** Let me know when you have had a chance to look through it.

A Okay. I have had a chance to look at it.

**Q** Okay. If you turn to page 13, beginning, can you describe for me what this e-mail and the attachment were?

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**Q** And did you send this e-mail in the ordinary course of business?

A I did.

**Q** And did you prepare the attachment as well?

A I did.

**Q** Okay. What was the purpose of this

10 (Pages 34 to 37)

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A horizontal bar chart illustrating the prevalence of various comorbidities in a patient population. The y-axis lists the comorbidities, and the x-axis represents the percentage of patients affected, ranging from 0% to 100%.

Comorbidity	Percentage (%)
High blood pressure	~95
Diabetes	~90
Chronic heart disease	~85
Stroke	~80
Arthritis	~75
Obesity	~70
Chronic lung disease	~65
Migraine	~60
Osteoporosis	~55
Depression	~50
Alzheimer's disease	~45
Macular degeneration	~40
Glaucoma	~35
Huntington's disease	~30
Parkinson's disease	~25
Multiple sclerosis	~20
Amyotrophic lateral sclerosis	~15
Epilepsy	~10
Other neurological disorders	~5

The top 10 comorbidities, which account for the vast majority of cases, are highlighted by a red box. These include high blood pressure, diabetes, chronic heart disease, stroke, arthritis, obesity, chronic lung disease, migraine, osteoporosis, and depression.

A horizontal bar chart illustrating the distribution of 100 samples across 15 different categories. The y-axis is labeled with integers from 1 to 15. The x-axis represents the count of samples, ranging from 0 to 100. Each category is represented by a solid black horizontal bar. A red rectangular box highlights the first four categories (1-4), which together account for approximately 45 samples. Category 15 shows the highest count at approximately 95 samples.

Category	Approximate Sample Count
1	~10
2	~15
3	~10
4	~10
5	~10
6	~10
7	~10
8	~10
9	~10
10	~10
11	~10
12	~10
13	~10
14	~10
15	~95

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Term	Percentage (%)
Climate change	98
Global warming	95
Green energy	88
Sustainable development	85
Renewable energy	82
Eco-friendly	78
Clean energy	75
Carbon footprint	72
Green economy	68
Environmental protection	65
Conservation	62
Green technology	58
Carbon tax	55
Renewable resources	52
Green building	48
Green infrastructure	45
Green transportation	42
Green agriculture	38
Green products	35
Green jobs	32
Green living	28
Green lifestyle	25
Green space	22
Green economy	18
Green energy	15
Green technology	12
Green infrastructure	10
Green transportation	8
Green agriculture	5
Green products	3
Green jobs	2
Green living	1
Green space	0

A horizontal bar chart illustrating the percentage of respondents who have heard of various environmental terms. The y-axis lists the terms, and the x-axis represents the percentage scale from 0% to 100%.

Term	Percentage (%)
Global warming	98
Green energy	95
Sustainable development	92
Clean water	90
Renewable energy	88
Carbon footprint	85
Recycling	82
Biodiversity	78
Organic food	75
Eco-friendly	72
Green technology	68
Green building	65
Green economy	62
Green infrastructure	58
Green space	55
Green transportation	52
Green architecture	48
Green products	45
Green living	42
Green lifestyle	38
Green products	35
Green energy	32
Green energy	28
Green energy	25
Green energy	22
Green energy	18
Green energy	15
Green energy	12
Green energy	8
Green energy	5
Green energy	2
Green energy	1



[REDACTED] 62 [REDACTED] 64

6 Q Okay. So I am handing you what has been  
7 marked Exhibit 101, which is Bates stamped  
8 ZFL-1103001 and attachment Bates stamp ZFL-1103002.  
9 (Exhibit 101 was marked.)  
10 BY MR. SILVERMAN:  
11 Q Let me know when you have had a chance to  
12 look through it.  
13 A Okay.  
14 Q Did you write this e-mail in the ordinary  
15 course of business?  
16 A I did.  
17 Q And did you draft the attachment as well?  
18 A I did.  
19 Q Okay. Can you describe what the  
20 attachment is?  
[REDACTED]

[REDACTED] 63 [REDACTED] 65

[REDACTED]

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Q Did anyone else assist you in the research or preparation of those --  
A No.

18 (Pages 66 to 69)



1       A Yes, multiple. Both here and the Vegas  
2 market, outside of the Vegas market, yes, there are.  
3       **Q Okay. I don't have any other questions.**  
4       MR. SILVERMAN: Okay.  
5       THE VIDEOGRAPHER: This concludes today  
6 deposition of Denitza Batchvarova on January 25,  
7 2017. The time is 4:23 P.M. We are off the video  
8 record.  
9       (TIME NOTED: 4:23 P.M.)

5  
1 STATE OF NEVADA)  
2 ) ss  
3 COUNTY OF CLARK)  
4 I, Sarah Padilla, a duly commissioned and  
5 licensed court reporter, Clark County, State of Nevada,  
6 do hereby certify: That I reported the taking of the  
7 deposition of the witness, Denitza Batchvarova,  
8 commencing on Wednesday, January 25, 2017, at 9:11 A.M.;  
9 That prior to being examined, the witness was, by me,  
10 duly sworn to testify to the truth; That thereafter I  
11 transcribed my shorthand notes into typewriting and  
12 that the typewritten transcript of said deposition is a  
13 complete, true, and accurate record of said shorthand  
14 notes. I further certify that I am not a relative  
15 or employee of any attorney or counsel of any of the  
16 parties nor a relative or employee of an attorney or  
17 counsel involved in said action, nor a person  
18 financially interested in the action; that a request  
19 [x] has [ ] has not been made to review the transcript.

20 IN WITNESS WHEREOF, I have hereunto set my  
21 hand in the County of Clark, State of Nevada, this 14th  
22 day of February.

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SARAH PADILLA, CCR 929

1  
2 STATE OF \_\_\_\_\_ )  
3 ) :ss  
4 COUNTY OF \_\_\_\_\_ )  
5  
6  
7 I, DENITZA BATCHVAROVA, the  
8 witness herein, having read the foregoing  
9 testimony of the pages of this deposition,  
10 do hereby certify it to be a true and  
11 correct transcript, subject to the  
12 corrections, if any, shown on the attached  
13 page.

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